

June 16, 2006

VIA HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Division Clerk
RI Division of Public Utilities & Carriers
89 Jefferson Boulevard
Warwick, RI 02888

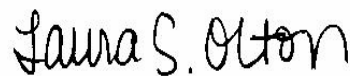
**RE: Docket D-06-13 - Joint Petition of The Narragansett Electric Company and Southern Union Company for Approval of Purchase and Sale of Assets
Response to Attorney General's Data Request 4-1**

Dear Ms. Massaro:

Enclosed please find five (5) copies of responses from The Narragansett Electric Company, d/b/a National Grid, to the fourth set of data requests issued by the Attorney General on June 15, 2006, in the above-captioned proceeding. This set includes a response to data request 4-1.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me at (401) 784-7667.

Very truly yours,



Laura S. Olton

Enclosures

cc: Docket D-06-13 Service List

Attorney General's Data Request 4-1

Request:

Please provide the following documents SUG 001-1.1, 001.4, 008.3, 008.5, 008.6 and 008.9.¹

Response:

Attached is a copy of the file referenced as 008.3.

Regarding documents referenced as 001-1.1, 001.4, and 008.5, these documents have been submitted to Southern Union for their determination whether confidentiality protection needs to be sought before copies are produced, as required by a confidentiality agreement between Southern Union and National Grid.

Regarding 008.6, this document is listed as "Filings with Environmental Agencies and Related Correspondence" and appears on the list that was provided to the Attorney General's representative during his visit to the data room on May 30. However, we have reviewed the voluminous files and determined that the item numbered as 008.6 was not in the data room and it is not clear that National Grid ever had possession of such file, even though it is listed. We will continue to track down details about this file and provide a supplemental response if more information is obtained.

Regarding 008.9, please be advised that this is not a single document. Rather, it consists of multiple files containing hundreds of pages of documents relating to miscellaneous environmental matters having nothing to do with the Tiverton matter that has been a subject of this case. They include environmental reports, test boring logs and soil summaries for locations not relating to Tiverton, transporter permits, training certificates, transporter inspection forms, spreadsheets of data, and other miscellaneous correspondence, among other various other topics. Despite their lack of relevancy, they remain available for review at Melrose Street by the Attorney General and will remain so throughout the pendency of the case.

The Company respectfully requests that the Attorney General return to the data room and develop a more specific list of those documents for which hard copies are sought. Otherwise, the process of determining confidentiality with Southern Union, assessing relevancy of this vast set of files, and copying would be very burdensome and not time efficient.

¹ As discussed, the Attorney General is willing to execute a mutually acceptable form of Protective Order in order to obtain these documents.

Attorney General's Data Request 4-1 (continued)

For these reasons, without more specificity as to why hard copies of each document in these files are relevant or needed for the case at this time, the Company objects to the wholesale copying and production of all the files contained in 008.9.

Prepared by or under the supervision of: Ronald T. Gerwatowski

Certificate of Service

I hereby certify that a copy of the cover letter and materials accompanying this certificate were mailed or hand-delivered to the parties listed below.



Joanne M. Scanlon

Date: June 16, 2006

National Grid & Southern Union - Docket D-06-13 Updated Service List as of 5/15/06

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File an original & four (4) copies w/: Luly E. Massaro, Division Clerk Division of Public Utilities & Carriers 89 Jefferson Blvd. Warwick, RI 02888	Lmassaro@puc.state.ri.us	401-780-2107 401-941-1691